

Nancy Williams
Herbalife Distributor

Re: Business Opportunity Rule, R511993

Federal Trade Commission

July 13, 2006

Dear Sir or Madam:

I have been with Herbalife since 1982 and have enjoyed the products on both a personal level and being able to share them with others. I am able to share both the products and the business opportunity. Quite a few of my new customers have signed up to purchase product at wholesale prices for their own use and to be able to share the products and income opportunity with others.

In reading a little of the new proposed FTC rules, I am greatly alarmed. And I think that by making a few changes to the FTC suggested rules, your rules can be made stronger and more protective, and yet not in a way that harms my business and the incomes of those whom I have introduced to Herbalife business. The rules you currently propose will dramatically drop my income and the incomes of people I've introduced to the Herbalife business.

Herbalife has always had high integrity in the products and in the way we share the business opportunity. Herbalife is a member of the direct selling association which has **rules in place where our company will buy back at 100% of any unused components of the new distributor kit within 90 days. And Herbalife will buy back at 90% all resalable product inventory bought by that distributor within the preceding year. This is MUCH stronger in protecting new distributors !!**

If the FTC would require this buy back by all direct sales companies, this would be MUCH stronger and MUCH more protective than what the FTC is currently proposing!

I am currently enjoying one of the advantages of this type of marketing in that I only work part time and enjoy more than what would be considered a generous full time income. Herbalife has allowed me over the last 24 years to work at whatever pace fits me best at the time. No job could offer this. Nor can traditional business offer this.

Having people be forced to review and sign a disclosure statement before they can do the business would stop the flow and natural progression of how we share our products and business opportunity. It would be equal to asking a person who is overweight "are you sure you want to lose weight? . . . now I want you to think about this for a week before I help you lose weight." That just isn't human nature, as the best time to start a weight loss plan, an

exercise plan, or other lifestyle change, is when you have the 'spark' or 'incentive' to get going with it. . . .

And our business is the same way, if we make a person wait a week to start rather than being able to start immediately when they have the motivation, we would be taking away from most of these people the flexible lifestyle I have enjoyed since 1982. Often, along with a person signing up as a distributor, they have the motivation at that moment to start losing weight and/or gaining good health with the nutrition of those products, and having to set a second appointment 10 days or two weeks later just isn't going to happen in many cases as much of our business is done in casual conversation with friends or people we meet at the grocery store, or new acquaintances made at events, etc. This would cause more than double time and work.

In Herbalife many of our customers who benefit from the products then decide to become a distributor so that they can enjoy an income from home and share the products that they love. Almost all of my income has been derived from retailing the products and then the natural progression of a percentage of those product customers wanting to duplicate what I do to earn some income and be able to work from home. I am excited to be able to offer "product lovers" the opportunity to work at home around their family schedule, and earn income from sharing the products and company they love with others. And I know that Herbalife is an honest opportunity and has protective measures in place for new distributors to not be harmed.

I could not have shared the products and signed up others to share the products with the restrictions and time restraints that are proposed.

Nancy Williams
Herbalife Distributor